

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JOYCE HUTCHENS, )  
                        )  
                        )  
Plaintiff,         )                      Case No. 13-CV-6447  
                        )  
v.                     )                      Judge Edmond E. Chang  
                        )  
CHICAGO BOARD OF EDUCATION, )  
                        )  
                        )  
Defendant.         )

**DEFENDANT BOARD'S MOTION TO STRIKE  
PLAINTIFF'S EXHIBITS FILED IN VIOLATION OF PROTECTIVE ORDER**

Defendant Board of Education of the City of Chicago (the “Board”) files this Motion to Strike Plaintiff’s Exhibits Filed in Violation of Protective Order and states:

**ARGUMENT**

On December 1, 2014, Plaintiff filed a Motion to Compel (Docket #51) to which she attached several pages of Board-produced documents marked “CONFIDENTIAL—SUBJECT TO PROTECTIVE ORDER.”<sup>1</sup> (Docket #51 at 40, 42-43) The Protective Order the Court entered bars Plaintiff from filing these documents unless she does so under seal. (Docket #26 ¶¶5, 7) The Board promptly asked Plaintiff to withdraw the documents from the public record and refile them under seal, but Plaintiff has ignored that request. (**Exhibit A**) Therefore, the Board asks the Court to strike the documents from the record and award the Board all other relief to which it may be entitled.

Additionally, despite the Board’s reasonable efforts to resolve this clear-cut matter without Court intervention, Plaintiff’s willful lack of cooperation with same necessitated the filing of this Motion. Therefore, the Board further asks that the Court sanction Plaintiff for her misconduct.

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<sup>1</sup> Plaintiff did not include the exhibits marked “CONFIDENTIAL” in the copy of her Motion served on the Board. Board counsel discovered her Protective Order violation by reviewing the copy of Docket #51 filed in the Court’s ECF/Pacer system.

## **CONCLUSION**

The Board respectfully requests that the Court grant this Motion, strike pages 40, 42 and 43 of Docket #51 from the public record and award the Board all other relief to which it may be entitled, including a sanction against Plaintiff in the amount of the Board's costs and fees incurred in filing this Motion.

Respectfully submitted,

## **COUNSEL FOR DEFENDANT THE BOARD OF EDUCATION OF THE CITY OF CHICAGO**

JAMES L. BEBLEY  
General Counsel

By: /s/ Lisa A. Dreishmire  
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## **CERTIFICATE OF SERVICE**

I certify that I caused this pleading to be served upon Plaintiff *pro se* by CM-ECF E-Filing pursuant to General Order on Electronic Case Filing, Section XI(C), on December 5, 2014.

s/Lisa A. Dreishmire  
Lisa A. Dreishmire